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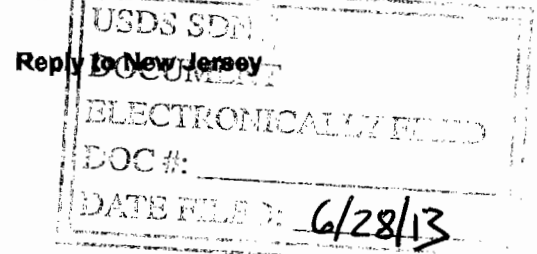
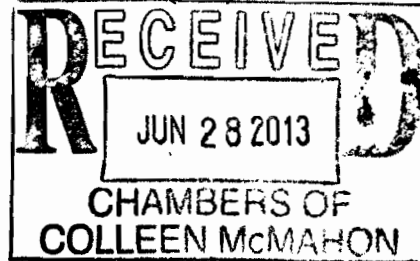
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June 28, 2013

VIA FACSIMILE



Hon. Colleen McMahon, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

*Plaintiff's expert
report is timely.
Defendants' deadline for
their expert report is
extended to August 26, 2013*

Re: **Leena Varughese, M.D. v. Mount Sinai Medical Center, et al.**
Civil Action No. 12 Civ. 8812 (CM)

Dear Judge McMahon:

Colleen McMahon

I represent Leena Varughese, M.D., in the above-referenced matter. The parties submitted correspondence to Judge Francis relating to issues with the Scheduling Order. Judge Francis advised that he has no authority to change Your Honor's Scheduling Order. Accordingly, I hereby submit for the Court's consideration the letters previously submitted to Judge Francis.

6/28/13

MEMO ENDORSED

In substance, the Court endorsed a letter dated April 8, 2013, which permitted the parties to postpone the deadlines for plaintiff's deposition and plaintiff's expert reports pending completion of mediation. The mediator in this matter continued to work on this matter through the week of May 17, 2013. As is explained in the enclosed correspondence, three (3) days of plaintiff's deposition has been completed to date. Defendants seek two (2) additional days. The parties have jointly requested that a new date be set by which plaintiff's deposition be completed.

Plaintiff produced her affirmative expert report close to within thirty (30) days following the week of May 17, 2013. As detailed in the correspondence, defendants have raised a timeliness issue, which plaintiff vigorously disputes. Regardless, defendants have

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requested that they have until August 26, 2013, to serve a responsive expert report. Plaintiff consents to this modified date.

We thank the Court for its consideration of this matter.

Respectfully submitted,

Ronald J. Wronko

Encl.

cc: Rory J. McEvoy, Esq. (via facsimile)